

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

LAWRENCE A. LOCKE, MATTHEW  
BROWN and CHRISTOPHER LLOYD,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

QUIBIDS LLC and QUIBIDS HOLDINGS  
LLC,

Defendants.

Case No. 5:10-cv-01277-F

**JOINT MOTION FOR STAY**

Plaintiffs Lawrence A. Locke, Matthew Brown, and Christopher Lloyd (“Plaintiffs”) and Defendants QuiBids LLC and QuiBids Holdings LLC (“Defendants”) respectfully and jointly move the Court to stay all proceedings in this case for 14 days for the parties to engage in settlement discussions. In support of their joint motion, the parties state as follows:

1. On December 29, 2011, the Court granted QuiBids’ Motion to Dismiss and Plaintiff’s Motion for Leave File a Second Amended Complaint. *See* Doc. No. 41.
2. On February 7, 2012, the Court granted Plaintiff Locke’s order to set a settlement conference. *See* Doc. No. 47.
3. That settlement conference occurred before Magistrate Judge Bana Roberts on March 1, 2012. The case did not settle. *See* Doc. No. 52.

4. On April 11, 2012, Plaintiffs filed their Corrected Second Amended Complaint. *See* Doc. No. 55.

5. Defendants moved to dismiss the Corrected Second Amended Complaint on April 30, 2012. *See* Doc. No. 63.

6. The parties filed response and reply briefs and that motion is now pending before the Court. *See* Doc. Nos. 67 (Plaintiffs' Response Brief) and 72 (Defendants' Reply Brief).

7. On May 29, 2012, in connection with their response to Defendants' motion to dismiss the Second Amended Complaint, Plaintiffs also moved for leave to file a Third Amended Complaint, *see* Doc. No. 68, which motion Defendants opposed. *See* Doc No. 75. That motion is also now pending before the Court.

8. On July 23, 2012, Plaintiffs filed a supplemental motion for leave to add additional allegations to the proposed Third Amended Complaint. *See* Doc. No. 77. Defendants have not yet responded to that motion.

9. Counsel for the parties have recently had discussions regarding settlement and seek a brief stay to engage in further settlement discussions.

10. To facilitate this attempt by the parties to settle this action, the parties respectfully and jointly request that the Court briefly stay all proceedings in this case (including ruling on all pending motions) and extend the period within which Defendants must respond to Plaintiffs' supplemental motion for leave to amend (Doc. No. 77) for a period of 14 days, until August 22, 2012.

WHEREFORE, the parties jointly request that the Court stay all proceedings in this matter until August 22, 2012.

Respectfully submitted,

/s/ Michael D. McClintock

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants.

*s/ Michael D. McClintock*